

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

EARL PARRIS, JR., individually, and
on behalf of a Class of persons similarly
situated,

Plaintiff,

CITY OF SUMMERVILLE,
GEORGIA,

Intervenor-Plaintiff,

v.
3M COMPANY, et al.,

Defendants.

Civil Action No.
4:21-cv-00040-TWT

MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to the Court’s Local Rules, LR App. H, Section II(J), Plaintiff and Intervenor-Plaintiff (“Plaintiffs”), by the through the undersigned counsel, respectfully requests leave of this Court to file under seal Exhibits 14 and 16 to Plaintiffs’ Motion to Compel. Defendant Mount Vernon Mills has claimed that these materials contain confidential information. This information was obtained through discovery, and due to the claims by the Defendant, should be kept confidential at this time. Plaintiffs filing under seal does not indicate agreement with Defendant about these designations.

WHEREFORE, Plaintiffs respectfully request that the Court grant Plaintiffs' leave to file under seal Plaintiffs' Exhibits 14 and 16 Plaintiffs' Motion to Compel.

Respectfully submitted, this 2nd day of February, 2023.

/s/ Gary A. Davis

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CERTIFICATE OF COMPLIANCE

Pursuant to Northern District of Georgia Civil Local Rule 7.1.D., the undersigned counsel certifies that the foregoing filing is prepared in Times New Roman 14-point font, as mandated in Local Rule 5.1.C.

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the within and foregoing **PLAINTIFF AND INTERVENOR-PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL** was electronically filed with the Clerk of Court using the CM/ECF system, which automatically serves notification of such filing to all counsel of record.

This 2nd day of February, 2023.

/s/ Gary A. Davis